

1 THE VELEZ LAW FIRM, P.C.
2 MARK P. VELEZ (SBN 163484)
3 NATALYA V. GRUNWALD (SBN 265084)
4 3010 Lava Ridge Court, Suite 180
Roseville, CA 95661
Telephone: (916) 774-2720
Facsimile: (916) 774-2730
E-mail: velezlaw@live.com

6 Attorneys for Plaintiff
KYONA SANDERS

7 HANSON BRIDGETT LLP
JAHMAL T. DAVIS, SBN 191504
8 jdavis@hansonbridgett.com
9 WARREN HODGES, SBN 287162
whodges@hansonbridgett.com
0 425 Market Street, 26th Floor
San Francisco, California 94105
1 Telephone: (415) 777-3200
Facsimile: (415) 541-9366

12 Attorneys for Defendant
SUTTER VALLEY MEDICAL FOUNDATION

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

17 | KYONA SANDERS,

18 Plaintiff,

19 v.

20 SUTTER VALLEY MEDICAL FOUNDATION,

Defendant.

Case No. 2:23-cv-00589-TLN-DB

JOINT STIPULATION AND ORDER TO CONTINUE DISCOVERY DEADLINES

Trial Date: Not Set

This joint stipulation is entered into between Plaintiff KYONA SANDERS (“Plaintiff”) and Defendant SUTTER VALLEY MEDICAL FOUNDATION (“Defendant” and collectively, with Plaintiff, the “Parties”), through their respective counsel of record.

WHEREAS, the deadline to serve, by hand, all interrogatories, requests for production of documents, notices of depositions and requests for admission is December 29, 2023;

28 | //

1 WHEREAS, the deadline to complete all non-expert fact discovery, including motions to
2 compel discovery, is January 31, 2024;

3 WHEREAS, the deadline to exchange expert witness disclosures is April 1, 2024;

4 WHEREAS, the deadline to serve evidence intended to contradict or rebut expert witness
5 disclosures made under FRCP 26(a)(2)(B) or (C) absent a stipulation or court order is May 1, 2024;

6 WHEREAS, if the Parties do not intend to file dispositive motions, they are ordered to file
7 a Joint Notice of Trial Readiness no later than May 30, 2024;

8 WHEREAS, the last day to file dispositive motions is July 29, 2024;

9 WHEREAS, the first day Defendant could serve discovery, including subpoenas was June
10 22, 2023, after the Rule 26(f) conference, and Defendant served subpoenas for Plaintiff's medical
11 records on June 27, 2023, but did not receive all records subpoenaed until September 15, 2023;

12 WHEREAS, Defendant noticed Plaintiff's deposition on September 26, 2023 and took the
13 deposition of Plaintiff on October 10, 2023;

14 WHEREAS, Defendant sought to take the deposition of Plaintiff's medical provider, Fiona
15 Arenson, LMFT, on November 7, 2023, but Ms. Arenson requested a continuance to obtain counsel;

16 WHEREAS, Defendant intends to take the deposition of Plaintiff's Kaiser medical provider,
17 Ladan Khatibijah, Psy.D on December 15, 2023;

18 WHEREAS, Plaintiff's counsel has a trial scheduled to start November 13, 2023 and is
19 unavailable to attend depositions through the end of November 2023; and

20 WHEREAS, the Parties agree there is good cause to continue all of the above discovery
21 cutoff deadlines for 60 days, to allow the Parties sufficient time to complete all discovery in this
22 case. Good cause is shown by the Defendant's timely, diligent pursuit of discovery, and delays
23 caused by no fault of the Defendant.

24 **IT IS HEREBY STIPULATED AND AGREED** by and among the Parties to seek the
25 Court's approval as to the following proposed continuances:

26 1. The Parties deadline to complete all non-expert fact discovery, including motions to
27 compel discovery, be continued to April 1, 2024;

28 / / /

2. The Parties deadline to exchange expert witness information be continued to May 31, 2024;

3. The deadline to serve evidence intended to contradict or rebut expert witness disclosures made under FRCP 26(a)(2)(B) or (C) absent a stipulation or court order be continued to July 1, 2024;

4. The deadline to file a Joint Notice of Trial Readiness, if the Parties do not intend to file dispositive motions, be continued to July 29, 2024;

5. The deadline to file dispositive motions be continued to September 27, 2024.

DATED: November 8, 2023

THE VELEZ LAW FIRM, P.C.

By: /s/ Natalya V. Grunwald
MARK P. VELEZ
NATALYA V. GRUNWALD
Attorneys for Plaintiff
KYONA SANDERS

DATED: November 8, 2023

HANSON BRIDGETT LLP

By: /s/ Warren Hodges
JAHMAL T. DAVIS
WARREN HODGES
Attorneys for Defendant
SUTTER VALLEY MEDICAL FOUNDATION

ORDER

Based upon the stipulation of the Parties, and good cause appearing, the Court hereby orders the following discovery deadlines be continued as follows:

1. The Parties deadline to complete all non-expert fact discovery, including motions to
compel discovery, be continued to April 1, 2024;

6 2. The Parties deadline to exchange expert witness information be continued to May
7 31, 2024;

8 3. The deadline to serve evidence intended to contradict or rebut expert witness
9 disclosures made under FRCP 26(a)(2)(B) or (C) absent a stipulation or court order be continued to
10 July 1, 2024;

11 4. The deadline to file a Joint Notice of Trial Readiness, if the Parties do not intend to
12 file dispositive motions, be continued to July 29, 2024;

13 5. The deadline to file dispositive motions shall be continued to September 27, 2024.

IT IS SO ORDERED.

16 | DATED: November 8, 2023

Troy L. Nunley

Troy L. Nunley
United States District Judge